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### REMARKS

Claims 2-28 are pending in this application. Claim 1 is canceled in the interest of advancing prosecution in this case. The applicant reserves the right to pursue claim 1 in a divisional application.

The Office action rejects claims 2-5, 8-13, 15-16, 19, 21, and 23-28 under 35 U.S.C. 103(a) over Kikinis (USP 6,778,171) and Lazo et al. (USP 6,791,604). The applicant respectfully traverses this rejection on the grounds that the Office action omits one or more essential elements needed for a *prima facie* rejection.

MPEP 2142 clearly states:

"To establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) *must teach or suggest all the claim limitations*... If the examiner does not produce a *prima facie* case, the applicant is under no obligation to submit evidence of nonobviousness."

#### **Claims 2-5 and 8-10**

Claim 2, upon which claims 3-5 and 8-10 depend, claims a surveillance system that includes a video surveillance system that identifies a visual-object, an RF surveillance system that identifies an RF-object, and an object linker that links the visual-object to the RF-object, wherein the video surveillance system determines a first location coordinate corresponding to the visual-object, the RF surveillance system determines a second location coordinate corresponding to the RF-object, and a calibration module facilitates a reduction in a difference between the first location coordinate and the second location coordinate.

The Office action acknowledges that Kikinis does not disclose a calibration module that facilitates a reduction in a difference between the first location coordinate and the second location coordinate (Office action, page 4, lines 3-4), and does not assert that Lazo provides this teaching (Lazo is cited for teaching the claimed linking of the visual-object to the RF-object).

The Office action asserts that, because the video surveillance system and the RF surveillance system each continuously update the reported position of the

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tracked object, it would have been obvious "to include a calibration module that ensures that the coordinates are adjusted on a continuous bases (sic) to provide real-time location of the monitored objects" (Office action, page 4, lines 10-11). The applicant respectfully disagrees with this assertion, because in Kikinis, the determination of coordinates by an RF system and the determination of coordinates by a video system are independent of each other, and a continuous adjustment of these independently determined coordinates will not affect or reduce any differences between these coordinates.

The applicant respectfully notes that "assuring that the coordinates are adjusted on a continuous basis to provide real-time locations" does not imply or suggest reducing a difference between the coordinate reported by the video system and the coordinate reported by the RF system, as specifically claimed in claim 2. In the RF system of Kikinis, for example, the coordinates may be determined by GPS; any errors associated with the GPS coordinate determination in Kikinis are not affected (or corrected) by the coordinates determined by the video system, and thus any differences between the two reported coordinates will not be reduced merely by continuously updating each of the coordinates to provide real-time locations.

Because Kikinis and Lazo fail to teach a calibration module that facilitates a reduction in a difference between the first location coordinate and the second location coordinate, as specifically claimed in claim 2, the applicant respectfully maintains that the Office action fails to establish a prima facie case of obviousness, and therefore the rejection of claims 2-5 and 8-10 under 35 U.S.C. 103(a) over Kikinis and Lazo are unfounded, per MPEP 2142.

#### **Claims 11-13 and 15-16**

Claim 11, upon which claims 12-13 and 15-16 depend, claims a method of calibrating an RF location determination system that includes attaching an RFID tag to a visually identifiable object, determining a first location coordinate of the object based on an appearance of the object in a scene provided by a video

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camera, obtaining reception information from a plurality of receivers in response to a transmission from the RFID tag, determining a second location coordinate of the object based on the reception information from the plurality of receivers, and determining one or more adjustment parameters that facilitate a reduction in a difference between the first and second location coordinates of the object.

Lazo is not referenced in the rejection of claim 11.

The Office action acknowledges that "Kikinis does not specifically disclose the claimed method of determining one or more adjustment parameters that facilitate a reduction in a difference between the first and second location coordinates of the object" (Office action, page 5, lines 1-3).

The Office action asserts that, "Since Kikinis discloses that there is a continuous re-evaluation of the position of each monitored object, it would have been obvious to include a calibration module that ensures that the coordinates are adjusted on a continuous bases (sic) to provide real-time location of the monitored objects" (Office action, page 5, lines 7-10). As noted above, because the RF coordinate determination and the video coordinate determination of Kikinis are independent, "assuring that the coordinates are adjusted on a continuous basis to provide real-time locations" does not imply or suggest determining one or more adjustment parameters that facilitate a reduction in a difference between the coordinate reported by the video system and the coordinate reported by the RF system, as specifically claimed in claim 11.

Because Kikinis and Lazo fail to teach or suggest determining one or more adjustment parameters that facilitate a reduction in a difference between the video-determined and RFID-determined location coordinates of an object, as specifically claimed in claim 11, the applicant respectfully maintains that the Office action fails to establish a prima facie case of obviousness, and therefore the rejection of claims 11-13 and 15-16 under 35 U.S.C. 103(a) over Kikinis and Lazo are unfounded, per MPEP 2142.

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**Claims 19, 21, and 23-28**

Claim 19 claims a method of determining a location coordinate of an RF transmitter that includes: receiving a signal from the RF transmitter at a plurality of receivers, and determining the location coordinate of the RF transmitter based on reception information from the plurality of receivers and based on adjustment parameters that are based on one or more differences between first location determinations and second location determination of a target transmitter, wherein the first location determinations are based on visual images of the target transmitter, and the second location determinations are based on prior reception information from the plurality of receivers corresponding to transmissions from the target transmitter. That is, as taught by the applicant, a calibration process is used to compare the differences between locations based on visual images of the object and locations based on RF-emanations from the object, from which the adjustment parameters for subsequent RF coordinates are determined.

Lazo is not referenced in the rejection of claim 19.

The Office action acknowledges that "Kikinis does not specifically disclose the claimed method of determining one or more adjustment parameters that facilitate a reduction in a difference between the first and second location coordinates of the object" (Office action, page 5, lines 1-3).

The Office action asserts that, "Since Kikinis discloses that there is a continuous re-evaluation of the position of each monitored object, it would have been obvious to include a calibration module that ensures that the coordinates are adjusted on a continuous bases (sic) to provide real-time location of the monitored objects" (Office action, page 5, lines 7-10). As noted above, because the RF coordinate determination is independent of the video coordinate determination in Kikinis, "assuring that the coordinates are adjusted on a continuous basis to provide real-time locations" does not imply or suggest determining the location of an RF transmitter based on adjustment parameters that are based on one or more differences between first locations based on

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visual images of the target transmitter and second locations based on prior transmissions from the target transmitter.

Because Kikinis and Lazo fail to teach determining the location coordinate of the RF transmitter based on reception information from the plurality of receivers and based on adjustment parameters that are based on one or more differences between first location determinations and second location determination of a target transmitter, wherein the first location determinations are based on visual images of the target transmitter, and the second location determinations are based on prior reception information from the plurality of receivers corresponding to transmissions from the target transmitter, as specifically claimed in claim 19, the applicant respectfully maintains that the Office action fails to establish a prima facie case of obviousness, and therefore the rejection of claims 19, 21, and 23-28 under 35 U.S.C. 103(a) over Kikinis and Lazo are unfounded, per MPEP 2142.

In view of the foregoing, the applicant respectfully requests that the Examiner withdraw the rejections of record, allow all the pending claims, and find the present application to be in condition for allowance. If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,



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